

BALDASSARE & MARA, LLC

Attorneys at Law

VIA EMAIL

July 2, 2021

Honorable John Michael Vazquez,
United States District Judge
United States District Court
Frank Lautenberg Post Office & U.S. Courthouse
2 Federal Square
Newark, NJ 07102

Re: *United States v. Russell Stinnett*,
Crim. No. 19-668 (JMV)

Dear Judge Vazquez:

As the Court knows, this firm represents Defendant Russell Stinnett in the above-referenced matter. With the government's consent, we hereby request that the deadline for Mr. Stinnett's challenges to the authenticity, chain of custody, or scientific analysis of the government's exhibits be moved from today to Tuesday, July 6, 2021.

To date, the government has provided approximately 128 exhibits, and over the last 36 hours, four business records certifications covering 118 of those exhibits. We do not take issue with the timing or breadth of the government's disclosures. We merely require additional time to effectively review the materials.

If this request meets with the Court's approval, we ask that Your Honor "So Order" this letter to be filed on the docket. We thank the Court for its consideration of this matter and wish the Court a happy holiday weekend.

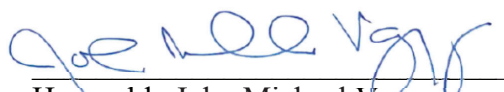
Respectfully,



Michael Baldassare

cc: Ari B. Fontecchio, Assistant United States Attorney
Daniel V. Shapiro, Assistant United States Attorney

SO ORDERED THIS 2nd DAY OF JULY, 2021



Honorable John Michael Vazquez,
United States District Judge